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June 1, 2025

*Via ECF*

Honorable Diane Gujarati  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Nicole Daedone and Rachel Cherwitz, 23-CR-146

Dear Judge Gujarati:

Pursuant to Rule 26.2 of the Federal Rules of Criminal Procedure, defendants Rachel Cherwitz and Nicole Daedone are submitting to the Court for *in camera* review video interviews of Marisa Ward and David Hutchison, whom the defendants intend to call in their case-in-chief. These videos are work-product protected. *See In re GJ Subpoena Dated February 21, 2023*, 23-mc-715-PKC, Dkt. No. 16. Further, following an inquiry by the defendants, the government has failed to detail any steps it has taken since Judge Pamela K. Chen's July 27, 2023 order to reach out to these witnesses. The government, therefore, has not demonstrated substantial need. *See id.*

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